

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*¹

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA

Title III

No. 17 BK 3284-LTS

**STIPULATION AND PROPOSED ORDER TO FURTHER EXTEND DEADLINES SET
FORTH IN THE COURT'S ORDER ENTERED ON FEBRUARY 14, 2019 (ECF NO. 596)**

¹ The Debtors in these Title III Cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States District Judge Laura Taylor Swain:

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), as fiscal agent and financial advisor of the Commonwealth of Puerto Rico (the “Commonwealth”), and the Official Committee of Unsecured Creditors (the “UCC,” and together with AAFAF and the Commonwealth, the “Parties”) respectfully submit the following *Stipulation and Proposed Order to Further Extend Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* (the “Stipulation”) requesting entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), to amend the deadlines in connection with the *Informative Motion Regarding Stipulation Section 15.2 Expenses* [ECF No. 582] (the “Motion”).

WHEREAS, on February 14, 2019, the Court entered the *Order Setting Deadline for Joint Status Report in Connection with Informative Motion Regarding Stipulation Section 15.2 Expenses* [ECF No. 596], setting a deadline for AAFAF and the UCC to file a joint status report in connection with the Motion and for AAFAF to file a further separate brief by the same deadline regarding its positions on the contracting issues raised by the UCC if those issues have not been resolved consensually.

WHEREAS, on May 22, 2019, the Court entered the *Order Further Extending Deadlines Set Forth in the Court’s Order Entered on February 14, 2019 (ECF No. 596)* [ECF No. 638] (the “Revised Scheduling Order”), extending the deadlines in connection with the Motion.

WHEREAS, under the Revised Scheduling Order, the joint status report is due July 3, 2019, and the matter will be heard at the July 24, 2019 omnibus hearing.

NOW THEREFORE, the Parties have agreed to the following extension of deadlines set forth in the Revised Scheduling Order in order to permit the Parties to continue to meet and confer in an attempt to consensually resolve outstanding issues regarding the Motion:

1. August 22, 2019: AAFAF and the UCC to file a joint status report. Unless the UCC's objections have been resolved, AAFAF will file a separate brief regarding its positions on the contracting issues raised by the UCC;
2. September 11, 2019: Motion to be heard at the September Omnibus Hearing.
3. For the avoidance of doubt, nothing herein shall affect the rights of any party, person, or entity with respect to discovery, or to oppose discovery, in connection with the Motion, or to seek further adjournment of the Motion, or to oppose such adjournment, all of which rights are fully preserved.

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Dated: San Juan, Puerto Rico
June 30, 2019

/s/ Peter Friedman

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Dated: San Juan, Puerto Rico
June 29, 2019

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Exhibit A

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</p> <p style="padding-left: 40px;">as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,¹</p> <p style="padding-left: 40px;">Debtors.</p>	<p>PROMESA Title III</p> <p>No. 17 BK 3283-LTS</p> <p>(Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO</p> <p style="padding-left: 40px;">as representative of</p> <p>PUERTO RICO SALES TAX FINANCING CORPORATION,</p> <p style="padding-left: 40px;">Debtor.</p>	<p>PROMESA Title III</p> <p>No. 17 BK 3284-LTS</p>

**ORDER FURTHER EXTENDING DEADLINES SET FORTH
IN THE COURT'S ORDER ENTERED ON FEBRUARY 14, 2019 (ECF NO. 596)**

¹ The Debtors in these Title III Cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Upon the *Stipulation to Further Extend Deadlines Set Forth in the Court's Order Entered on February 14, 2019 (ECF No. 596)* (the “Stipulation”);² and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant to PROMESA section 307(a); and the Court having found good cause to grant the relief requested in the Stipulation, it is **HEREBY ORDERED THAT:**

1. The Stipulation is approved as set forth herein.
2. The Revised Scheduling Order is amended to revise existing deadlines as follows:
 - a. August 22, 2019: AAFAF and the UCC to file a joint status report. Unless the UCC’s objections have been resolved, AAFAF will file a separate brief regarding its positions on the contracting issues raised by the UCC; and
 - b. September 11, 2019: Motion to be heard at the September Omnibus Hearing.
3. For the avoidance of doubt, nothing herein shall affect the rights of any party, person, or entity with respect to discovery, or to oppose discovery, in connection with the Motion, or to seek further adjournment of the Motion, or to oppose such adjournment, all of which rights are fully preserved.

SO ORDERED.

Dated: _____, 2019
San Juan, Puerto Rico

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Stipulation.